

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Alabama Municipal Electric Authority)
and Cooperative Energy)

v.)

Docket No. EL18-147-000

Alabama Power Company)
Georgia Power Company)
Gulf Power Company)
Mississippi Power Company)
Southern Company Services, Inc.)

**MOTION TO INTERVENE
OF POWERSOUTH ENERGY COOPERATIVE, INC.**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”),¹ PowerSouth Energy Cooperative, Inc. (“PowerSouth”) hereby moves to intervene in the above-captioned proceeding concerning the May 10, 2018, formal complaint filed by Alabama Municipal Electric Authority and Cooperative Energy (collectively, “Joint Complainants”) against Alabama Power Company, Georgia Power Company, Gulf Power Company, Mississippi Power Company, and Southern Company Services, Inc., (collectively, “Southern Companies”). In support hereof PowerSouth states the following:

I. COMMUNICATIONS

Communications concerning this proceeding should be addressed to the following individuals, and each should be included on the official service list compiled by the Secretary of the Commission in this proceeding:

¹ 18 C.F.R. § 385.214 (2018).

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II. MOTION TO INTERVENE

PowerSouth is a generation and transmission (“G&T”) cooperative providing the wholesale power needs of 20 distribution members – 16 electric cooperatives and four municipal electric systems – serving nearly 1 million end-users in 39 Alabama and 10 Florida counties. In order to meet its service obligations, PowerSouth purchases transmission service from the Southern Companies pursuant to the rates, terms, and conditions of the Southern Companies’ Open Access Transmission Tariff (“OATT”).

On May 10, 2018, Joint Complainants filed a formal complaint pursuant to sections 206 and 306 of the Federal Power Act,² and Rule 206 of the Commission’s Rules of Practice and Procedure³ alleging that the 11.25% base return on common equity currently included in the formula transmission rate of the Southern Companies is unjust and unreasonable and should be reduced to 8.65%. As a customer taking transmission service under the Southern Companies’ OATT, PowerSouth has a direct and substantial interest that may be affected by the outcome of this proceeding. PowerSouth’s interests cannot be represented adequately by any other party to these proceedings, and its participation in them would be in the public interest. PowerSouth therefore requests that it be permitted to intervene as a party in this proceeding.

² 16 USC §§ 824e and 825e (2012).

³ 18 CFR § 385.206 (2018).

Respectfully submitted,

POWERSOUTH ENERGY COOPERATIVE, INC.

/s/ Sean T. Beeny

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Attorneys for PowerSouth Energy Cooperative, Inc.

June 4, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 4th day of June, 2018.

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